

REMARKS

In the Office Action dated November 6, 2007, claims 28-29 were rejected under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement; claim 25 was rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,748,005 (Riazi); claims 1-3, 5-6, and 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over Riazi in view of U.S. Patent No. 5,877,745 (Beeteson); claims 7 and 8 were rejected under 35 U.S.C. § 103(a) as unpatentable over Riazi in view of Beeteson and further in view of U.S. Patent No. 5,280,583 (Nakayama); claim 27 was rejected under 35 U.S.C. § 103(a) as unpatentable over Riazi in view of U.S. Patent No. 6,748,005 (Gawne); claims 9-10 and 12-13 were rejected under 35 U.S.C. § 103(a) as unpatentable over Riazi in view of U.S. Patent No. 7,200,649 (Batke) and further in view of U.S. Patent No. 5,905,719 (Arnold); claims 11, 14, and 24 were rejected under 35 U.S.C. § 103(a) as unpatentable over Riazi in view of Batke, Arnold, and Beeteson; claims 21 and 30 were rejected under 35 U.S.C. § 103(a) as unpatentable over Riazi in view of Batke, Arnold, and Gawne; and claims 22-23 were rejected under 35 U.S.C. § 103(a) as unpatentable over Riazi in view of Batke, Arnold, and Nakayama.

REJECTION UNDER 35 U.S.C. § 112, ¶ 1

Claim 28 was rejected under 35 U.S.C. § 112, ¶ 1, as purportedly failing to comply with the written description requirement. Specifically, the Office Action stated that the Specification does not provide support for the “second display driver” element of claim 28. 5/19/08 Office Action at 3.

Applicant respectfully disagrees. As conceded by the Examiner, page 7, lines 1-5, of the Specification discloses “multiple monitors” that can be wirelessly connected to a single computer. An example of a wireless computer monitor 120 is depicted in Fig. 2 and described in the text accompanying Fig. 2. Moreover, operation of such wireless computer monitor 120 is described throughout the Specification. A person of ordinary skill would have understood from the description that a “second display driver” as recited in claim 28 would be present in a second wireless computer monitor.

Therefore, written description support clearly exists for claim 28 and its dependent claim 29, and withdrawal of the § 112, ¶ 1 is respectfully requested.

REJECTION UNDER 35 U.S.C. § 102

In response to the arguments presented in the previous Reply to Office Action, the present Office Action merely stated that a “display driver” is not recited in claim 25. Applicant did not previously argue that claim 25 recites a “display driver”.

Claim 25 recites a computer system comprising:

- a computer main unit;
- a computer wireless transceiver connected to said computer main unit; and
- a first wireless computer monitor, including:
 - (a) a monitor wireless transceiver configured to receive from said computer main unit via said computer wireless transceiver video data corresponding to a video signal,
 - (b) a computer display device connected to said monitor wireless transceiver and communicating signals to and receiving communication signals from said monitor wireless transceiver, and
 - (c) a data translator, coupled between said computer display device and said monitor wireless transceiver, for receiving from the monitor wireless transceiver video data contained in wireless signals transmitted from the computer wireless transceiver, translating the received video data to produce translated video data, and providing the translated video data to the computer display device.

As a preliminary note, it is respectfully submitted that the present anticipation rejection of claim 25 over Riazi is improper in view of the concession made previously by the Examiner that Riazi fails to “teach data translation means, coupled between said computer display device and said monitor wireless transceiver,” in connection with claim 25. *See* 1/29/2007 Office Action at 14. This constitutes an admission by the Examiner that Riazi does not disclose the translating of video data as recited in claim 25.

As purportedly disclosing a data translator as recited in claim 25, the present Office Action cited column 6, lines 1-15, of Riazi, which provides the text corresponding to Fig. 8 of Riazi. 5/19/2008 Office Action at 5. The cited passage of Riazi refers to a video demodulator 110 that receives and demodulates video information sent from the base station 20. As argued by Applicant previously, a demodulator does **not** translate data. A demodulator is an electronic circuit used to recover or extract information modulated on a carrier wave or signal. *See, e.g.,*

THE AMERICAN HERITAGE DICTIONARY[®] OF THE ENGLISH LANGUAGE, 4th Edition (defining “demodulate” as “[t]o extract (information) from a modulated carrier wave”) (previously submitted); Merriam-Webster’s Online Dictionary (defining “demodulate” as “to extract the information from (a modulated signal)”) (previously submitted). Therefore, all the demodulator 110 of Riazi is performing is extracting the video data from RF signals received from the base station 20 of Riazi. **Extracting** video data from a modulated carrier wave or signal, as performed by the demodulator 110 of Riazi, clearly does not constitute **translating** video data contained in wireless signals, as recited in claim 25.¹

In fact, a key teaching of Riazi that would indicate that no **translation** is being performed by the demodulator 110 of Riazi is the statement in column 6 of Riazi that the “video displayed on the display 14 [of the wireless handheld device depicted in Fig. 8 of Riazi] **replicates** the video which would be displayed by the local PC monitor 46” Riazi, 6:1-2 (emphasis added). Thus, the statement that the video displayed on the display 14 **replicates** the video displayed by the local PC monitor 46, which is associated with the PC 30, strongly indicates that **no translation** is performed; otherwise, the replication (which means no conversion) of video on the PC monitor 46 and the handheld display device 14 would **not** be possible.

Therefore, the objective evidence of record establishes that Riazi does not disclose the subject matter of claim 25. In fact, this point was actually conceded by the Examiner in an earlier Office Action (1/29/2007 Office Action noted above).

Therefore, claim 25 is not anticipated by Riazi.

REJECTION UNDER 35 U.S.C. § 103 OVER RIAZI AND BEETESON

It is respectfully submitted that the obviousness rejection of claim 1 over Riazi and Beeteson is defective. (Note that claim 1 has been amended to recite a “display monitor” rather than a “computer system”).

To make a determination under 35 U.S.C. § 103, several basic factual inquiries must be performed, including determining the scope and content of the prior art, and ascertaining the differences between the prior art and the claims at issue. *Graham v. John Deere Co.*, 383 U.S. 1,

¹ An example definition for “translate” is “[t]o convert a data file from one file format to another, or to convert a program from one programming language to another.” See WEBSTER’S NEW WORLD COMPUTER DICTIONARY, 10th ed., p. 337 (attached as an exhibit hereto).

17, 148 U.S.P.Q. 459 (1965). Moreover, as held by the U.S. Supreme Court, it is important to identify a reason that would have prompted a person of ordinary skill in the art to combine reference teachings in the manner that the claimed invention does. *KSR International Co. v. Teleflex, Inc.*, 127 S. Ct. 1727, 1741, 82 U.S.P.Q.2d 1385 (2007).

The Office Action conceded that Riazi fails to disclose the “display driver” recited in claim 1. 5/19/2008 Office Action at 7. However, the Office Action cited Beeteson as purportedly disclosing this claimed feature of claim 1. *Id.* In particular, the Office Action cited Fig. 2 and column 3, lines 16-36 of Beeteson. *Id.*

Fig. 3 and the column 3 passage of Beeteson refer to drive circuitry 21. However, the discussion of the drive circuitry 21 in Beeteson provides absolutely no teaching or hint whatsoever of provision of a display driver in place of the demodulator 110 of Riazi. There is no teaching that the drive circuitry 21 of Beeteson is provided between a computer display device and a monitor wireless transceiver to perform the tasks recited in claim 1.

Therefore, even if Riazi and Beeteson could be hypothetically combined, the hypothetical combination of references would not have led to the claimed invention.

Moreover, it is noted that Beeteson discloses that an interface cable 110 (wired cable) is used to connect the display 20 and computer base unit 10. *See* Beeteson, Figs. 1-3; 2:44-50. In fact, although Beeteson teaches that wireless communications is possible between the display device 20 and **peripheral devices** 30, 40, 50, Beeteson specifically teaches that the data transfer between the **computer base unit** 10 and the **display device** 20 is a **wired** connection, which is contrary to the teachings of Riazi and the claimed invention. Stated differently, Beeteson would have led a person of ordinary skill in the art away from using a wireless transceiver between the computer base unit and the display device. In fact, incorporating the drive circuitry 21 of Beeteson into Riazi would have meant that the interface cable 110 of Beeteson would have been incorporated into Riazi in place of the wireless connection of Riazi, which would have been inconsistent with the invention.

Therefore, since a person of ordinary skill in the art would not have been prompted to combine the teachings of Riazi and Beeteson, the obviousness rejection of claim 1 is further defective for this additional reason.

REJECTION UNDER 35 U.S.C. § 103 OVER RIAZI, BATKE, ARNOLD, AND BEETESON

Independent claim 9 has been amended to incorporate subject matter of former claim 14, now cancelled.

Claim 14 was rejected as purportedly obvious over Riazzi, Batke, Arnold, and Beeteson. In view of the defective obviousness rejection over Riazzi and Beeteson, it is respectfully submitted that the obviousness rejection of claim 14 over the above combination of references is also defective.

CONCLUSION

Dependent claims are allowable for at least the same reasons as corresponding independent claims. In view of the defective rejections of base claims, the obviousness rejections of dependent claims are also defective.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 08-2025 (10015860-1).

Respectfully submitted,

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